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*Attorneys for Defendant Dignity Health*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALLISON R. VECE, individually; KEVIN H.  
PHELPS, individually; and GAYLE FEDELE,  
individually,

Plaintiffs,

vs.

DOE Special Administrator of the Estate of  
JOSEPH W. PLAUTZ, deceased; DESERET  
WOMEN'S HEALTH CARE MANAGEMENT,  
LLC d/b/a DESERET WOMEN'S CARE;  
DIGNITY HEALTH f/k/a ST. ROSE DE LIMA  
HOSPITAL; ROE MEDICAL FACILITIES;  
DOES 1 through 10; ROE CORPORATIONS 13  
through 20; and ABC LIMITED LIABILITY  
COMPANIES 21 through 30,

Defendants.

Case No.: 2:24-cv-01025-GMN-EJY

**STIPULATION AND ORDER TO  
EXTEND DEFENDANT DIGNITY  
HEALTH'S TIME TO RESPOND TO  
PLAINTIFFS' FIRST AMENDED  
COMPLAINT**

**(FIRST REQUEST)**

1 Defendant Dignity Health f/k/a St. Rose De Lima Hospital (“Dignity Health”) and Plaintiffs  
2 Allison R. Vece; Kevin H. Phelps; and Gayle Fedele (“Plaintiffs”) (collectively, the “Parties”)  
3 hereby stipulate as follows:

4 1. On March 26, 2024, Plaintiffs filed a Complaint in the Eighth Judicial District Court,  
5 Clark County, Nevada (Case No.: A-24-889839-C) (the “State Court Action”);

6 2. On April 2, 2024, Plaintiffs filed a First Amended Complaint in the State Court  
7 Action (the “FAC”);

8 3. On April 3, 2024, Plaintiffs filed an Errata to Plaintiffs’ First Amended Complaint in  
9 the State Court Action (the “Errata”);

10 4. On May 1, 2024, Plaintiffs served Dignity Health with the FAC and Errata;

11 5. On May 21, 2024, Plaintiffs granted Dignity Health an extension to file an Answer to  
12 Plaintiffs’ FAC until 7 days after the last of the other Defendants have been served;

13 6. On May 31, 2024, Dignity Health filed Defendant Dignity Health’s Notice of  
14 Removal Pursuant to 28 U.S.C. §§ 1332, 1441, AND 1446 (ECF No. 1).

15 7. Absent an extension of time, Dignity Health’s deadline to respond to Plaintiffs’ FAC  
16 would be June 7, 2024.

17 8. Based upon their prior agreement, the Parties stipulate and agree to extend the  
18 deadline for Dignity Health to file an Answer to Plaintiffs’ FAC to be 7 days after the last of the  
19 other Defendants have been served. In the event the Court desires a date certain, the Parties  
20 alternatively stipulate and agree to extend the deadline for Dignity Health to file an Answer to  
21 Plaintiffs’ FAC to be July 12, 2024.

22 9. This is Dignity Health’s first requested extension. This stipulation is made in good  
23 faith and not to delay the proceedings.

10. This stipulation is entered into without waiver of any of the parties' respective rights, claims, or defenses.

Dated this 7<sup>th</sup> day of June, 2024.

Dated this 7<sup>th</sup> day of June, 2024.

**BAILEY ♦ KENNEDY**

**CHRISTIAN MORRIS TRIAL ATTORNEYS**

By: /s/ Joshua M. Dickey

By: /s/ Victoria R. Allen

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WITHIN 14 DAYS)

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**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

Dated: June 7, 2024